UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA

In re:)	
)	
New Beginnings Care, LLC)	Case No. 16-10272 NWW
Abbeville Healthcare & Rehab, LLC)	Case No. 16-10273 SDR
Campus Healthcare & Rehab, LLC)	Case No. 16-10275 NWW
Cedarcreek Healthcare & Rehab, LLC)	Case No. 16-10276 SDR
Eastman Healthcare & Rehab, LLC)	Case No. 16-10277 SDR
Edwards Redeemer Healthcare & Rehab, LLC)	Case No. 16-10278 NWW
Goodwill	Healthcare & Rehab, LLC)	Case No. 16-10279 NWW
Jefferson	ville Healthcare & Rehab, LLC)	Case No. 16-10280 NWW
Mt Pleasa	ant Healthcare & Rehab, LLC)	Case No. 16-10282 SDR
Oceansid	e Healthcare & Rehab, LLC)	Case No. 16-10283 SDR
Pinewood Healthcare & Rehab, LLC)	Case No. 16-10284 SDR
Rockmart Healthcare & Rehab, LLC)	Case No. 16-10285 SDR
Savannah Beach Healthcare & Rehab, LLC)	Case No. 16-10286 SDR
Woodlan	ds Healthcare & Rehab, LLC)	Case No. 16-10287 SDR
)	
	Debtors.)	Chapter 11
)	Jointly Administered
			Requested
			_

DEBTORS' EXPEDITED MOTION TO LIMIT NOTICE AND ESTABLISH NOTICE PROCEDURE

NOTICE OF HEARING

Notice is hereby given:

That a hearing will be held in the Third Floor Courtroom A, Historic Post Office and Courthouse, 31 East 11th Street, Chattanooga, Tennessee 37402, on January 26, 2016, at 10:00 a.m., on this Motion.

If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend the hearing, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

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New Beginnings Care, LLC; Abbeville Healthcare & Rehab, LLC; Campus Healthcare & Rehab, LLC; Cedarcreek Healthcare & Rehab, LLC; Eastman Healthcare & Rehab, LLC; Edwards Redeemer Healthcare & Rehab, LLC; Goodwill Healthcare & Rehab, LLC; Jeffersonville Healthcare & Rehab, LLC; Mt Pleasant Healthcare & Rehab, LLC; Oceanside Healthcare & Rehab, LLC; Pinewood Healthcare & Rehab, LLC; Rockmart Healthcare & Rehab, LLC; Savannah Beach Healthcare & Rehab, LLC; and Woodlands Healthcare & Rehab, LLC; Debtors and Debtors-in-Possession in the above-styled case (collectively "Debtors"), pursuant to Fed. R. Bankr. P. 2002(g)(i) and (m) and 9007, and E.D. Tenn. LBR 2002.1 requests that the Court enter an order limiting the parties and entities to whom notice of certain matters be given. In support of its motion, the Debtors show the Court as follows:

- 1. The Debtors have a significant number of creditors, many with relatively small claims, and the Debtors and other interested parties will have numerous matters to bring before the Court for which notice to all creditors would be unduly burdensome and expensive to the estate. The Debtors believes that the designation of a list of creditors and interested parties for purposes of giving limited notices in this case will result in efficient administration and will not impair the rights of interested parties.
- 2. Fed. R. Bankr. P. 9007 authorizes the Court to regulate notice procedures. Fed. R. Bankr. P. 2002(m) further authorizes the Court to control the manner and form in which notice is to be given and the entities to whom notice is to be given. Fed. R. Bankr. P. 2002(i) provides that the Court may order that notices required by Fed. R. Bankr. P. 2002(a)(2), (3) and (6), be mailed only to the United States Trustee, the District Director of the Internal Revenue Service and Committees and their authorized agents, and to the

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creditors and equity security holders and other parties in interest who serve on the

Debtors and file with the Clerk a request that all notices be sent to them.

Wherefore, the Debtors request that the Court enter an order in the form attached to the Order establishing a uniform notice procedure in this case.

SCARBOROUGH & FULTON

/s/David J. Fulton By:

> David J. Fulton, #006102 701 Market Street, Suite 1000 Chattanooga, Tennessee 37402

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this Motion was served in order of preference by email, fax or overnight delivery with sufficient postage to carry it to its destination, dated this 24th day of January, 2016.

> United States Trustee Ustpregion08.cn.ecf@usdoj.gov

U.S. Attorney USATNE.ECFChattBK@usdoj.gov

30 largest unsecured creditors

Gemino Healthcare Finance c/o Stacy Allen 1 International Plaza, Ste 220 Philadelphia, PA 19113 Stacy.allen@gemino.com

> /s/David J. Fulton By: David J. Fulton